



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

IN RE:

AIR CRASH INTO THE JAVA SEA  
ON JANUARY 9, 2021

MDL No. 1:23MD3072

MOTION FOR LEAVE TO FILE

Charles Herrmann, Anthony Marsh, and Mohammad Hamoudi on behalf of Plaintiffs Aprillia et al. request leave of this Court for formal admission solely in this matter under Eastern District of Virginia (EDVA) Local Civil Rule 83.1 and Rule of the Judicial Panel on Multidistrict Litigation, Rule (Multidist. Lit. R.) 2.1(c). Boeing takes no position on this motion.

On June 14, 2023, plaintiffs, through counsel made their first appearance before the Court. The first appearance followed the transfer of this matter to this Court under 28 U.S.C. § 1407 from United States District Court, Northern District of Illinois. Plaintiffs intend to file pleadings for the Court's consideration.

EDVA Local Rule 83.1 governs the appearance of foreign parties. It allows for pro hac vice admission in a specific case and allows an attorney to appear and sign pleadings and other files, provided that: (a) The rules of the United States District of the district in which the practitioner maintains an office extend a similar privilege to members of the bar of this Court; and (b) That such practitioners from another state shall be

accompanied by a member of the bar of this Court in all appearances before this Court. EDVA 83.1(E)(1)(a)(b). An attorney can seek exemption from the rule provided "leave of Court" is obtained. EDVA 83.1(G).

Any attorney of record in any action transferred under 28 U.S.C. § 1407 may continue to represent his or her client in the district to which the action is transferred. Multidist. Lit. R. 2.1(c). That rule further provides that parties are not required to obtain local counsel in the transferee district. Id.

Undersigned counsel maintains an office in the United States District, Western District of Washington and that court extends similar privilege to members of the bar in the Eastern District of Virginia. Western District of Washington, Local Rule 83.1.

Undersigned counsel seeks leave of Court for a narrow exemption: that they be allowed to appear pro hac vice without the accompaniment by a member of this Court solely for this matter under EDVA 83.1(G) and Multidist. Lit. R. 2.1(c).

Plaintiffs respectfully ask that an exemption be granted.

Dated: June 18, 2023

Respectfully submitted,

By: /s/ Mohammad Hamoudi  
By Counsel

*Motion granted*

*Claude M. Hilton*  
*USBJ*

*June 22, 2023*

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